

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AGWAY FARM & HOME SUPPLY, LLC.¹

Debtor.

Chapter 11

Case No. 22-10602 (JKS)

Re: Docket No. ____

**ORDER SUSTAINING PLAN ADMINISTRATOR'S FIRST OMNIBUS OBJECTION TO
CERTAIN CLAIMS (NON-SUBSTANTIVE)
(Duplicate Claims, Amended/Superseded Claims, Late-Filed Claims)**

Upon consideration of the *Plan Administrator's First Omnibus Objection to Certain Claims (Non-Substantive)* (the "Objection");² and upon consideration of the Squasoni Declaration; and the United States District Court for the District of Delaware having jurisdiction to consider this Objection under 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection is in the best interests of the Debtor, its estate, its creditors and other parties in interest; and this Court having found that the Plan Administrator's notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other notice need be provided;

¹ The last four digits of the Debtor's federal tax identification number are 1247. The address for correspondence related to the Debtor is c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, DE 19701.

² Capitalized terms not defined herein shall have the meanings ascribed to the terms in the Objection.

and this Court having reviewed the Objection and determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is sustained to the extent set forth herein.
2. The Duplicate Claims listed on Schedule 1 are hereby disallowed and expunged in their entirety.
3. The Amended/Superseded Claims listed on Schedule 2 are hereby disallowed and expunged in their entirety.
4. The Late-Filed Claims listed on Schedule 3 are hereby disallowed and expunged in their entirety.
5. The Plan Administrator is authorized to take any action necessary or appropriate to give effect to this Order and the relief granted therein.
6. Stretto, the Court-appointed claims and noticing agent in the Chapter 11 Case, is hereby authorized and directed to make such revisions to the official claims register as are necessary to reflect the relief granted in this Order.
7. The Plan Administrator's objection to each Duplicate Claim, Amended/Superseded Claim, and Late-Filed Claim constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Duplicate Claim, Amended/Superseded Claim, and Late-Filed Claim. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter which involves

such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.

8. This Order is without prejudice to the rights of the Plan Administrator, the estate, any successor thereto, and any other party in interest, to object to any other proof of claim filed in the Chapter 11 Case.

9. The Court shall retain jurisdiction over the claimants whose claims are subject to the Objection with respect to any matter arising from or related to the Objection or this Order, including the interpretation, enforcement and implementation of this Order.

Schedule 1
Duplicate Claims

SCHEDULE 1 – DISPUTED DUPLICATE CLAIMS

DISPUTED CLAIM TO BE DISALLOWED				SURVIVING CLAIM				Objection
Name of Claimant	Claim #	Date Filed	Claim Amount	Name of Claimant	Claim #	Date Filed	Claim Amount	
Agri-Fab, Inc	216	9/29/2022	Secured \$ -	Bradford Capital Holdings, LP [as Assignee of Agri-Fab, Inc]	209	9/29/2022	Secured \$ -	Duplicate Claim asserted.
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 73,045.14				General Unsecured \$ 73,045.14	
			Total \$ 73,045.14				Total \$ 73,045.14	
Best Bee Brothers LLC	59	8/10/2022	Secured \$ -	Best Bee Brothers LLC	157	9/14/2022	Secured \$ -	Duplicate Claim asserted.
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 28,577.04				General Unsecured \$ 28,577.04	
			Total \$ 28,577.04				Total \$ 28,577.04	
Dutch Valley Growers	45	8/2/2022	Secured \$ -	Dutch Valley Growers	229	1/30/2023	Secured \$ -	Duplicate Claim asserted.
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 43,105.29				General Unsecured \$ 43,105.29	
			Total \$ 43,105.29				Total \$ 43,105.29	
Ghost Controls LLC	10	7/19/2022	Secured \$ -	Ghost Controls LLC	189	9/19/2022	Secured \$ -	Duplicate Claim asserted.
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 36,039.06				General Unsecured \$ 36,039.06	
			Total \$ 36,039.06				Total \$ 36,039.06	
Growmark FS, LLC	112	9/1/2022	Secured \$ -	Growmark FS, LLC	191	9/19/2022	Secured \$ -	Duplicate Claim asserted.
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 146,137.60				General Unsecured \$ 146,137.60	
			Total \$ 146,137.60				Total \$ 146,137.60	
Growmark, Inc	113	9/1/2022	Secured \$ -	Growmark, Inc	190	9/19/2022	Secured \$ -	Duplicate Claim asserted.
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 441,817.33				General Unsecured \$ 441,817.33	
			Total \$ 441,817.33				Total \$ 441,817.33	
Hain Capital Investors Master Fund, LTD [as Assignee of Rhino Seed and Landscape Supply, LLC]	94	8/23/2022	Secured \$ -	Hain Capital Investors Master Fund, LTD [as Assignee of Rhino Seed and Landscape Supply, LLC]	210	9/26/2022	Secured \$ -	Duplicate Claim asserted.
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 93,554.96				General Unsecured \$ 93,554.96	
			Total \$ 93,554.96				Total \$ 93,554.96	
Hoover's Hatchery Company, LLC	13	7/22/2022	Secured \$ -	Hoovers Hatchery Company LLC	122	8/30/2022	Secured \$ -	Duplicate Claim asserted.
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 21,764.06				General Unsecured \$ 21,768.46	
			Total \$ 21,764.06				Total \$ 21,768.46	
Hoover's Hatchery Company, LLC	121	8/30/2022	Secured \$ -	Hoovers Hatchery Company LLC	122	8/30/2022	Secured \$ -	Duplicate Claim asserted.
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 21,768.46				General Unsecured \$ 21,768.46	
			Total \$ 21,768.46				Total \$ 21,768.46	

Ragan and Massey LLC	186	9/19/2022	Secured \$	-	Ragan & Massey LLC	196	9/19/2022	Secured \$	-	Duplicate Claim asserted.
			Administrative \$	-				Administrative \$	-	
			Priority Unsecured \$	-				Priority Unsecured \$	-	
			General Unsecured \$	225,812.17				General Unsecured \$	225,812.17	
			Total \$	225,812.17				Total \$	225,812.17	
SL 323 Lockhouse Road LLC	192	9/19/2022	Secured \$	-	SL 323 Lockhouse Road LLC	228	1/23/2023	Secured \$	-	Duplicate Claim asserted.
			Administrative \$	-				Administrative \$	-	
			Priority Unsecured \$	-				Priority Unsecured \$	-	
			General Unsecured \$	1,078,352.60				General Unsecured \$	2,018,426.51	
			Total \$	1,078,352.60				Total \$	2,018,426.51	
Southern States Chatham Cooperative Inc	114	9/1/2022	Secured \$	-	Southern States Chatham Cooperative Inc	237	10/2/2023	Secured \$	-	Duplicate Claim asserted.
			Administrative \$	-				Administrative \$	-	
			Priority Unsecured \$	-				Priority Unsecured \$	-	
			General Unsecured \$	25,461.05				General Unsecured \$	25,461.05	
			Total \$	25,461.05				Total \$	25,461.05	

Schedule 2

Amended/Superseded Claims

SCHEDULE 2 – DISPUTED AMENDED/SUPERSEDED CLAIMS

DISPUTED CLAIM TO BE DISALLOWED				SURVIVING CLAIM				Objection
Name of Claimant	Claim #	Date Filed	Claim Amount	Name of Claimant	Claim #	Date Filed	Claim Amount	
Automotive Rentals, Inc.	185	11/4/2020	Secured \$ -	Automotive Rentals, Inc.	233	3/8/2023	Secured \$ -	Amended Claim
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ 24,250.84				Priority Unsecured \$ 1,430.44	
			General Unsecured \$ 17,728.54				General Unsecured \$ 16,383.28	
			Total \$ 41,979.38				Total \$ 17,813.72	
Bekaert Corporation	7	7/12/2022	Secured \$ -	Bekaert Corporation	231	2/1/2023	Secured \$ -	Amended Claim
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 840,745.91				General Unsecured \$ 804,770.95	
			Total \$ 840,745.91				Total \$ 804,770.95	
Bradford Capital Holdings, LP [as Assignee of Agri-Fab, Inc]	135	9/7/2022	Secured \$ -	Bradford Capital Holdings, LP [as Assignee of Agri-Fab, Inc]	209	9/29/2023	Secured \$ -	Amended Claim
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 62,293.50				General Unsecured \$ 73,045.14	
			Total \$ 62,293.50				Total \$ 73,045.14	
CCA Financial LLC	69	8/12/2022	Secured \$ 185,000.00	CCA Financial LLC	234	3/9/2023	Secured \$ -	Amended Claim
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 211,305.00				General Unsecured \$ 215,105.71	
			Total \$ 396,305.00				Total \$ 215,105.71	
Hain Capital Investors Master Fund, LTD [as Assignee of Gallagher North America, Inc.]	163	9/15/2022	Secured \$ -	Hain Capital Investors Master Fund, LTD [as Assignee of Gallagher North America, Inc.]	170	9/15/2022	Secured \$ -	Amended Claim
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 675,579.68				General Unsecured \$ 675,579.68	
			Total \$ 675,579.68				Total \$ 675,579.68	
Ragan & Massey LLC	174	9/16/2022	Secured \$ -	Ragan and Massey LLC	186	9/19/2022	Secured \$ -	Amended Claim
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 224,551.44				General Unsecured \$ 225,812.17	
			Total \$ 224,551.44				Total \$ 225,812.17	
Saunders Brothers, Inc	30	7/27/2022	Secured \$ -	Saunders Brothers, Inc	100	8/30/2022	Secured \$ -	Amended Claim
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 19,280.21				General Unsecured \$ 19,280.21	
			Total \$ 19,280.21				Total \$ 19,280.21	
SL 323 Lockhouse Road LLC	184	9/17/2022	Secured \$ -	SL 323 Lockhouse Road LLC	228	1/23/2023	Secured \$ -	Amended Claim
			Administrative \$ -				Administrative \$ -	
			Priority Unsecured \$ -				Priority Unsecured \$ -	
			General Unsecured \$ 1,078,352.60				General Unsecured \$ 2,018,426.51	
			Total \$ 1,078,352.60				Total \$ 2,018,426.51	
Southern States Cooperative, Inc.	180	9/16/2022	Secured \$ -	Southern States Cooperative, Inc.	225	1/9/2023 1/9/2023 6/29/2023	Secured \$ -	Amended Claim
			Administrative \$ -		226		Administrative \$ -	
			Priority Unsecured \$ -		236		Priority Unsecured \$ -	
			General Unsecured \$ 7,214,773.00		General Unsecured \$ 1,682,043.12			
			Total \$ 7,214,773.00		Total \$ 1,682,043.12			

Schedule 3
Late-Filed Claims

SCHEDULE 3 – DISPUTED LATE-FILED CLAIMS

LINE	NAME	CLAIM #	DATE FILED	DISPUTED CLAIM		SURVIVING CLAIM (IF ANY)	
				PRIORITY STATUS	AMOUNT		AMOUNT
1	AGRATRONIX	214	10/5/2022	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 5,596.53	General Unsecured	\$0.00
				Subtotal	\$5,596.53	Subtotal	\$0.00
				Reason: Objection, Late filed. Asserted Claim for pre-petition goods sold. Claim filed after the General Bar Date, September 19, 2022.			
2	AGRIVENTURES RETAIL	212	10/3/2022	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 1,551.17	General Unsecured	\$1.36
				Subtotal	\$1,551.17	Subtotal	\$1.36
				Reason: Objection, Late filed. Asserted Claim for pre-petition open credit. Claim filed after the General Bar Date, September 19, 2022. Scheduled Claim 2408160 for \$1.36 survives.			
3	Argo Partners [as Assignee of Evergreen	224	12/5/2022	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 205,258.38	General Unsecured	\$148,119.71
				Subtotal	\$205,258.38	Subtotal	\$148,119.71
				Reason: Objection, Late filed. Asserted Claim for pre-petition goods sold. Claim filed after the General Bar Date, September 19, 2022. Scheduled Claim 2408270 for \$148,119.71 survives.			
4	Dano Group	204	9/21/2022	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 18,995.20	General Unsecured	\$18,995.20
				Subtotal	\$18,995.20	Subtotal	\$18,995.20
				Reason: Objection, Late filed. Asserted claim is for pre-petition invoices for shipment of cargo pursuant to bills of lading. Claim filed after the General Bar Date, September 19, 2022. A single Scheduled Claim 2408243 for \$18,995.20 survives.			

LINE	NAME	CLAIM #	DATE FILED	DISPUTED CLAIM		SURVIVING CLAIM (IF ANY)	
				PRIORITY STATUS	AMOUNT		AMOUNT
5	Dano Group	206	9/26/2022	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 18,995.20	General Unsecured	\$0.00
				Subtotal	\$18,995.20	Subtotal	\$0.00
				Reason: Objection, Late filed. Asserted claim is for pre-petition invoices for shipment of cargo pursuant to bills of lading. Claim filed after the General Bar Date, September 19, 2022. See above re Scheduled Claim 2408243.			
6	Eastern Shore Forest Products Inc.	207	9/27/2022	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 70,308.83	General Unsecured	\$59,652.00
				Subtotal	\$70,308.83	Subtotal	\$59,652.00
				Reason: Objection, Late filed. Asserted claim is for pre-petition goods sold, finance charges and interest. Claim filed after the General Bar Date, September 19, 2022. Scheduled Claim 2408257 for \$59,652.00 survives.			
7	EMSCO Inc. DBA EMS CO Group	221	11/9/2022	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 17,724.00	General Unsecured	\$0.00
				Subtotal	\$17,724.00	Subtotal	\$0.00
				Reason: Objection, Late filed. Asserted claim is for pre-petition goods sold. Claim filed after the General Bar Date, September 19, 2022.			
8	Grant County Mulch Inc	217	10/6/2022	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 46,974.60	General Unsecured	\$16,970.88
				Subtotal	\$46,974.60	Subtotal	\$16,970.88
				Reason: Objection, Late filed. Asserted claim is for pre-petition goods sold. Claim filed after the General Bar Date, September 19, 2022. Scheduled Claim 2408298 for \$16,970.88 survives.			

				DISPUTED CLAIM		SURVIVING CLAIM (IF ANY)	
LINE	NAME	CLAIM #	DATE FILED	PRIORITY STATUS	AMOUNT		AMOUNT
9	Johnson's Milling and Feed, Inc.	227	1/11/2023	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 477.60	General Unsecured	\$0.00
				Subtotal	\$477.60	Subtotal	\$0.00
				Reason: Objection, Late filed. Asserted claim is for pre-petition credits issued to account from incorrect drafts. Claim filed after the General Bar Date, September 19, 2022.			
10	Kontoor Brands	230	1/31/2023	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 31,917.40	General Unsecured	\$25,492.15
				Subtotal	\$31,917.40	Subtotal	\$25,492.15
				Reason: Objection, Late filed. Asserted claim is for pre-petition goods sold. Claim filed after the General Bar Date, September 19, 2022. Scheduled Claim 2408338 for \$25,492.15 survives.			
11	Oldcastle APG, Inc. [Oldcastle Architectural]	220	11/4/2022	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 658,215.00	General Unsecured	\$634,792.50
				Subtotal	\$658,215.00	Subtotal	\$634,792.50
				Reason: Objection, Late filed. Asserted claim is for pre-petition goods sold. Claim filed after the General Bar Date, September 19, 2022. Scheduled Claims 2408402, 2408405, and 2408406 in the amount of \$634,792.50 survive.			
12	ShelterLogic	218	10/6/2022	Secured	\$ -	Secured	\$ -
				Administrative	\$ -	Administrative	\$ -
				Priority Unsecured	\$ -	Priority Unsecured	\$ -
				General Unsecured	\$ 18,213.30	General Unsecured	\$0.00
				Subtotal	\$18,213.30	Subtotal	\$0.00
				Reason: Objection, Late filed. Asserted claim is for pre-petition goods sold. Claim filed after the General Bar Date, September 19, 2022.			

		DISPUTED CLAIM			SURVIVING CLAIM (IF ANY)	
LINE	NAME	CLAIM #	DATE FILED	PRIORITY STATUS	AMOUNT	AMOUNT
13	The J.M. Smucker Company [The J.M. Smucker Co. and Smucker Retail Foods, Inc]	222	11/18/2022	Secured	\$ -	Secured \$ -
				Administrative	\$ -	Administrative \$ -
				Priority Unsecured	\$ -	Priority Unsecured \$ -
				General Unsecured	\$ 47,871.93	General Unsecured \$0.00
				Subtotal	\$47,871.93	Subtotal \$0.00
Reason: Objection, Late filed.						
14	The Lennox International Inc.	211	9/28/2022	Secured	\$ -	Secured \$ -
				Administrative	\$ -	Administrative \$ -
				Priority Unsecured	\$ -	Priority Unsecured \$ -
				General Unsecured	\$ 8,079.63	General Unsecured \$5,505.37
				Subtotal	\$8,079.63	Subtotal \$5,505.37
Reason: Objection, Late filed. Asserted Claim is for pre-petition goods sold. Claim filed after the General Bar Date, September 19, 2022. Scheduled Claim 2408347 for \$5,505.37 survives.						
15	Veritiv Operating Company	235	3/28/2023	Secured	\$ -	Secured \$ -
				Administrative	\$ -	Administrative \$ -
				Priority Unsecured	\$ -	Priority Unsecured \$ -
				General Unsecured	\$ 22,747.92	General Unsecured \$0.00
				Subtotal	\$22,747.92	Subtotal \$0.00
Reason: Objection, Late filed. Asserted Claim is for pre-petition goods sold. Claim filed after the General Bar Date, September 19, 2022.						
16	Watkins Products	215	10/5/2022	Secured	\$ -	Secured \$ -
				Administrative	\$ -	Administrative \$ -
				Priority Unsecured	\$ -	Priority Unsecured \$ -
				General Unsecured	\$ 5,812.59	General Unsecured \$3,734.21
				Subtotal	\$5,812.59	Subtotal \$3,734.21
Reason: Objection, Late filed. Asserted Claim is for pre-petition goods sold. Claim filed after the General Bar Date, September 19, 2022. Scheduled Claim 2408552 for \$3,734.21 survives.						